

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 05-10216JLT

CARLOS PINEDA and
ALEXANDRA PEREZ,
Plaintiffs,

v.

DANIEL KEELER, DENNIS
HARRIS, JOSPEH R. WATTS,
JOSEPH P. TOOMEY, WILLIAM
J. GALLAGHER, EDWARD
GATELY, JANINE BUSBY, and
the CITY OF BOSTON
Defendants.

ASSENTED TO DEFENDANTS' MOTION TO EXTEND THE MOTION FOR SUMMARY
JUDGMENT DEADLINE UNTIL MAY 7, 2007

The Defendants, Daniel Keeler, Dennis Harris, Joseph R. Watts, Joseph P. Toomey, William J. Gallagher, Edward Gately, Janine Busby, and the City Of Boston, respectfully move this Honorable Court to extend the deadline for Defendants' Motions for Summary Judgment until May 7, 2007, with Plaintiffs' Oppositions then due by May 28, 2007. As reasons for this motion:

1. Counsel for Plaintiffs, Stephen B. Hrones, has assented to this motion.
2. Yesterday, April 4, 2007, the Court ruled on Plaintiffs' motion and extended the discovery deadline until May 1, 2007, to complete depositions only.

3. However, the current deadline for Defendants to file for summary judgment is on April 16, 2007.
4. Accordingly, Defendants request that the deadline to file Motions for Summary Judgment be extended until May 7, 2007.
5. Plaintiffs' Oppositions to Defendants' Motions for Summary Judgment would then be due on May 28, 2007.
6. The trial of this matter is scheduled for June 4, 2007.
7. Allowing this motion will not prejudice any party to the action and will further the interests of justice and judicial economy.

WHEREFORE, Defendants respectfully request that this Honorable Court allow their motion to extend the motion for summary judgment deadline until May 7, 2007, with oppositions then due May 28, 2007.

Respectfully submitted,
DEFENDANTS DANIEL KEELER, DENNIS HARRIS, JOSEPH R. WATTS, JOSEPH P. TOOMEY, WILLIAM J. GALLAGHER, EDWARD GATELY, JANINE BUSBY and CITY OF BOSTON

William F. Sinnott
Corporation Counsel

By their attorney:

/s/ Thomas Donohue
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7.1 Certification

Undersigned counsel certifies that on April 4, 2007, pursuant to LR, D. Mass. 7.1(a)(2), he spoke with Plaintiffs' counsel who assented to the Defendants request to extend the deadlines for summary judgment.

/s/ Thomas Donohue
Thomas Donohue

CERTIFICATE OF SERVICE

I hereby certify that this document was filed through the ECF system and will therefore be sent electronically to the registered participants as identified on the Notice of Electric Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on April 5, 2007.

/s/ Thomas Donohue
Thomas Donohue